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21 *Attorneys for Defendant Meta Platforms, Inc.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Case No. 3:20-cv-08570-JD

Plaintiffs,

**DEFENDANT'S UNOPPOSED
ADMINISTRATIVE MOTION FOR
ISSUANCE OF LETTERS OF REQUEST**

v.

META PLATFORMS, INC., a Delaware
Corporation headquartered in California,

Judge: Hon. James Donato

Defendant.

1 Defendant Meta Platforms, Inc. respectfully requests that this Court execute, under its seal
2 and signature, the attached letters of request for International Judicial Assistance under the Hague
3 Convention on Taking of Evidence Abroad in Civil or Commercial Matters (“Hague Evidence
4 Convention”) to non-parties located in the People’s Republic of China and the British Virgin
5 Islands. The requests seek documents from two overseas entities:

6 Telegram
7 Vistra Corporate Services Centre
8 Wickhams Cay II, Road Town
9 Tortola, British Virgin Islands, VG 1110

10 Tencent
11 Tencent Binhai Building, No. 33
12 Haitian Second Road, Shenzhen, China

13 For the reasons set forth in more detail in the accompanying Memorandum of Points and
14 Authorities, Meta respectfully requests that the Court grant this motion and execute the attached
15 letters of request. Meta has informed Consumer and Advertiser Plaintiffs of the relief it is seeking,
16 and counsel for Plaintiffs stated that they take no position on the Motion.

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2 Dated: October 28, 2022

Respectfully submitted,

3 By: /s/ Sonal N. Mehta

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30 *Attorneys for Defendant Meta Platforms, Inc.*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 28th day of October, 2022, I electronically transmitted the
3 foregoing document to the Clerk's Office using the CM/ECF System.

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5 */s/ Sonal N. Mehta*
6 Sonal N. Mehta
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